



7852 Walker Drive, Suite 200, Greenbelt, MD 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

RECEIVED

FEB - 6 2006

Federal Communications Commission  
Office of Secretary

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc., Inc.  
236 Massachusetts Avenue, N.E. Suite 110  
Washington, DC 20002

**EB Docket No. 06-36  
EB-06-TC-060**

**Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006**

**Citizens Telephone Company – FCC 499 Filer ID: 804816**

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, John Staurulakis (JSI), its consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

**Attachment**

Copies: 4 additional copies to Secretary  
Byron McCoy, Telecommunications Consumers Division  
Best Copy and Printing (BCPI)

4. of Copies rec'd 0x4  
List A B C D E

Echelon Building II, Suite 200  
9430 Research Boulevard, Austin, Texas 78759  
Phone: 512-338-0473  
Fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
Eagan, Minnesota 55121  
Phone: 651-452-2660  
Fax: 651-452-1909

547 South Oakview Lane  
Bountiful, UT 84010  
Phone: 801-294-4576  
Fax: 801-294-5124

4625 Alexander Drive, Suite 135  
Alpharetta, Georgia 30022  
Phone: 770-569-2105  
Fax: 770-410-1608

**Citizens Telephone Company – FCC 499 Filer ID: 804816****P.O. Box 1137, Brevard, NC 28712****CERTIFICATION**

I am the Secretary-Treasurer, Controller of Citizens Telephone Company (the "Company"). On behalf of the Company, I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.<sup>1</sup> Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



David O. Albertson  
Secretary-Treasurer, Controller  
Citizens Telephone Company

February 3, 2006

Attachment

<sup>1</sup> 47 C.F.R. §§ 64.2001-2009.

## **STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Citizens Telephone Company (the “Company”) is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

*As of this date, the Company has not used CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.*

### **1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

### **2. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.

### **3. Customer Notification and Authorization Process**

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC’s Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides of written notification, the Company’s notification will comply with the requirements of the Section 64.2007(f)(2).

### **4. Training**

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

**5. Record of Customer CPNI Approval/Non-Approval**

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

**6. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

**7. Software Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

**8. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.